

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION**

ROSIE L. DAVIS, ET AL

PLAINTIFFS

v.

CASE NO. 4:88-cv-4082

WILLIAM DALE FRANKS, ET AL

DEFENDANTS

**JOINT MOTION FOR APPROVAL OF AGREED ORDER REGARDING
HSD'S MAGNET SCHOOL PROGRAM**

Come now the Plaintiffs and Hope School District ("HSD"), through its attorneys, Shawn Childs and Whitney F. Moore, and jointly move the Court to approve the agreed order attached hereto regarding HSD's implementation of a magnet school program. In support of this motion, the parties state:

1. On August 23, 2022, HSD filed with this Court is Motion for Approval of Magnet School Program. ECF No. 201.

2. On September 2, 2022, the Plaintiffs filed a motion for extension of time to respond to HSD's Motion. ECF No. 203.

3. The parties have negotiated in good faith and have reached an agreement that allows HSD to apply for grant funding and establish a magnet school program if said grant funding is awarded and that allows the Plaintiffs to monitor HSD's implementation of a magnet school program to ensure HSD's continued compliance with the terms of the Consent Decree filed in this case on January 8, 1990. A copy of the parties' proposed Agreed Order is filed herewith as Exhibit 1.

4. HSD will notify the Court and counsel for the Plaintiffs whether it receives an award of grant funding through the MSAP program as soon as reasonably possible after funding decisions are announced.

WHEREFORE, Plaintiffs and Hope School District respectfully pray that the Court approve the proposed Agreed Order and for all other just and proper relief.

Respectfully submitted,

WALKER & CHILDS, PLLC
1815 S. State Street
P.O. Box 3462
Little Rock, Arkansas 72206
Phone: (501) 287-8680
Email: schilds@walkerandchilds.com

By: **Shawn G. Childs**
Shawn G. Childs (Ark. Bar No. 99058)

Attorney for Plaintiffs

WHITNEY F. MOORE, P.A.
P.O. Box 280
Camden, Arkansas 71711-0280
Phone: (870) 818-5490
Email: whitney@aprobertslaw.com

By: **Whitney F. Moore**
Whitney F. Moore (Ark. Bar No. 2009193)

Attorney for Hope School District

CERTIFICATE OF SERVICE

I, Whitney F. Moore, do hereby certify that on September 9, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to:

All counsel of record

/s/ **Whitney F. Moore**
Whitney F. Moore